

## REMARKS

The Applicants thank the Examiner for the careful examination of this application and respectfully request the entry of the amendments indicated hereinabove.

Claims 11-15 are pending and rejected. Claim 11 is amended, Claims 12-15 are cancelled, and Claim 16 is added hereinabove. In response to the Specification and Claims rejections under 35 U.S.C §112, second paragraph, the Specification and Claim 11 are also amended hereinabove.

Amended independent Claim 11 positively recites forming a layer of nitride at least partially overlying the first layer of silicon, the layer of nitride being thermally grown; and forming a layer of oxide over the layer of nitride, the layer of oxide being deposited by LPCVD. In addition, Claim 11 positively recites that only two layers are present between the first layer of silicon and the second layer of silicon. These advantageously claimed features are not taught or suggested by the patents granted to Schlais et al., Kobayashi et al., Clementi et al., or Kaneoka; either alone or in combination.

Schlais et al. teaches away from the advantageously claimed invention by teaching that the layer of oxide is thermally grown (column 8 lines 28-31); not

deposited by LPCVD as advantageously claimed. Schlais et al. also teaches away from the advantageously claimed invention by teaching that the layer of nitride is deposited (column 8 lines 32-33, column 6 lines 47-51); not thermally grown as advantageously claimed.

Kobayashi et al. teaches away from the advantageously claimed invention by teaching that the layer of nitride is deposited by LPCVD (column 13 lines 47-51); not thermally grown as advantageously claimed. The applicants note that Kobayashi et al. also teaches away from the advantageously claimed invention by teaching that the silicon oxide film is annealed - immediately after its formation - for the purpose of introducing nitrogen atoms into the silicon oxide film (column 13 lines 41-46; see also column 14 lines 84-55).

Clementi et al. teaches away from the advantageously claimed invention by teaching the use of two layers of nitride (e.g. 6a and 6b; column 6 lines 1-5, column 4 lines 13-17, column 5 lines 45-50); not a single layer of nitride as advantageously claimed.

Similarly, Kaneoka et al. teaches away from the advantageously claimed invention by teaching the use of two layers of nitride (column 4 lines 18-20, column 5 lines 5-7, column 6 lines 49-56, column 7 line 1); not a single layer of nitride as advantageously claimed.

Therefore, the Applicants respectfully assert that Claim 11 is patentable over the patents granted to Schlais et al., Kobayashi et al., Clementi et al., and Kaneoka; either alone or in combination.

New independent Claim 16 positively recites forming a layer of oxide at least partially overlying the first layer of silicon, the layer of oxide being deposited by LPCVD; and forming a layer of nitride over the layer of oxide, the layer of nitride being thermally grown. In addition, Claim 16 positively recites that only two layers are present between the first layer of silicon and the second layer of silicon. These advantageously claimed features are not taught or suggested by the patents granted to Schlais et al., Kobayashi et al., Clementi et al., or Kaneoka; either alone or in combination.

Schlais et al. teaches away from the advantageously claimed invention by teaching that the layer of oxide is thermally grown (column 8 lines 28-31); not deposited by LPCVD as advantageously claimed. Schlais et al. also teaches away from the advantageously claimed invention by teaching that the layer of nitride is deposited (column 8 lines 32-33, column 6 lines 47-51); not thermally grown as advantageously claimed.

Kobayashi et al. teaches away from the advantageously claimed invention by teaching that the layer of nitride is deposited by LPCVD (column 13 lines 47-51); not thermally grown as advantageously claimed. The applicants note that Kobayashi et al. also teaches away from the advantageously claimed invention by teaching that the silicon oxide film is annealed - immediately after its formation - for the purpose of introducing nitrogen atoms into the silicon oxide film (column 13 lines 41-46; see also column 14 lines 84-55).

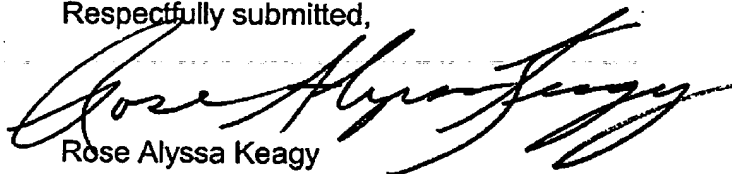
Clementi et al. teaches away from the advantageously claimed invention by teaching the use of two layers of nitride (e.g. 6a and 6b; column 6 lines 1-5, column 4 lines 13-17, column 5 lines 45-50); not a single layer of nitride as advantageously claimed.

Similarly, Kaneoka et al. teaches away from the advantageously claimed invention by teaching the use of two layers of nitride (column 4 lines 18-20, column 5 lines 5-7, column 6 lines 49-56, column 7 line 1); not a single layer of nitride as advantageously claimed.

Therefore, the Applicants respectfully assert that Claim 16 is patentable over the patents granted to Schlais et al., Kobayashi et al., Clementi et al., and Kaneoka; either alone or in combination.

For the reasons stated above, this application is believed to be in condition  
for allowance. Reexamination and reconsideration is requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Rose Alyssa Keagy", written in a cursive style.

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